

# Exhibit A

**Affidavit of Monica Collier**

I, Monica Collier, state as follows:

1. My name is Monica Collier.
2. I was an employee at the Vitale's restaurant located at 5779 Balsam Dr., Hudsonville, Michigan 49426.
3. I was an employee of the above Vitale's location from July 27, 2011 until approximately October 2017.
4. I stopped working at the above Vitale's location in October 2017.
5. By and through my attorneys at the Avanti Law Group, I filed suit against Vitale's Pizzeria of Hudsonville, LLC, Maurizio Logiudice, and Mandy Tithof on July 19, 2018 for violations under the Fair Labor Standards Act and Racketeer Influenced and Corrupt Organizations Act.
6. I have known Brianna Kloostra for four (4) years.
7. She and I worked together at Vitale's restaurant in Hudsonville, Michigan for three (3) years.
8. I had spoken to her and discussed the problems I had with our employment at Vitale's and she had similar experiences as I did.
9. Brianna was prepared to join the case as another plaintiff along with myself, and even signed an affidavit outlining the violations of the two federal statutes outlined in paragraph 5 on July 15, 2018.
10. Recently, I had asked when Brianna would sign the Consent to Sue form and formally become a party to the lawsuit.
11. Brianna responded that she had some misgivings in signing the Consent to Sue form because she had received threats, namely from Mandy Tithof.
12. Mandy Tithof relayed these threats through Catherine Duco, a current employee of Vitale's Hudsonville.
13. Through Catherine, Mandy has threatened Brianna Kloostra by saying that "bad things" will happen to anyone who joins the lawsuit.
14. Specifically, Catherine texted Brianna and told her that Mandy wanted her to know that should she or anyone proceed with joining the case, that they would face a harassment lawsuit.
15. Brianna has informed me that Mandy is making similar threats to employees and former employees alike that bad things will happen to people who join the lawsuit.
16. Because of Mandy Tithof's threats, Brianna told me that she no longer feels comfortable asserting her rights and joining the lawsuit as a plaintiff.
17. It is important to note that Brianna is seven months pregnant and Mandy as well as the Vitale's know that she's pregnant.

18. Mandy Tithof continues to makes threats to anyone who she believes would likely join the lawsuits filed by me against Vitale's.

I, Monica Collier , state under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Monica Collier

Executed on 8/27, 2018.